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Atorneys for Defendant,
FRONTIER AIRLINES, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANNE HEITING, an individual,

Plaintiff.

VS

FRONTIER AIRLINES, INC., a
Colorado corporation; DOES 1 through
25, inclusive.

Defendants.

CASE NO. 2:25-cv-01375 SPG (PDX)
[Assigned to Hon. Sherilyn Peace Garnett]

**DEFENDANT'S NOTICE OF
SETTLEMENT IN PRINCIPLE AND
MOTION TO VACATE ALL
DEADLINES**

The parties respectfully notify the Court that the parties have agreed in principle to settle the above-captioned matter. Counsel for the parties are in the process of preparing and finalizing the Settlement Agreement and Stipulated Dismissal (“Agreement”). The parties intend to file the stipulated dismissal as soon as practicable, but respectfully request that the parties are given 30 days to file the said stipulated dismissal. Accordingly, Defendant respectfully requests that the

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1 Court vacate the responsive pleading deadline as set forth in the April 10, 2025,
2 Order Granting Second Stipulation for Extension of Time to File Answer.

3 Defendant is filing this Notice and Motion with Plaintiff's approval and
4 permission.

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6 DATED: April 23, 2025 FITZPATRICK, HUNT & PAGANO, LLP

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8 By: 
Edward Tarolli

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Brian Maye
10 Attorneys for Defendant,
11 Frontier Airlines, Inc.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 23rd day of April 2025, a copy of the foregoing
3 document was electronically filed with the Clerk of the Court at USDC, Central
4 District of California, using CM/ECF system, which will send notification of such
5 filing to all parties in this action.

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8 Martha L. Rodriguez

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